

- 6 -

Commissioner for Patents**REMARKS**

Claims 33-44 remain in the application.

The Applicants notice that all references that were cited against the independent claims, namely claims 33 and 39, are references in the name of the present Applicants. Accordingly, the Applicants have the following comments about the citation of these references.

The present application introduces an assembly between a mold section of a die-casting machine, and a shank. As is known in the art, the mold section/shank assembly form a slide section, which is displaceable in a die-casting machine to cooperate with at least one other slide section. As the slide sections come together, the mold sections cooperate to define a cavity in which a part is cast. Therefore, the slide sections are displaceable members of a multiple-slide die-casting machine.

U.S. Patent No. 6,334,479 relates to a control system for an injection system of a multiple-slide die-casting machine. The Applicants started the drafting of the present application from the application that was granted U.S. Patent No. 6,334,479. Therefore, a good portion of the description is the same in the present application and in U.S. Patent No. 6,334,479. However, the Applicants draw the Examiner's attention to paragraphs [0074] to [0082] of the *"Detailed Description of the Preferred Embodiment"* of the present application, as well as to Figures 13 to 17 of the present application, all of which are not present in U.S. Patent No. 6,334,479. This new subject matter is the one for which the Applicants have produced the present claims, whereby the Applicants argue that the present application clearly differs from U.S. Patent No. 6,334,479, as per the teaching of novel subject matter, as will be described in further detail hereinafter.

Canadian Patent Application No. 2,308,990 is parent to U.S. Patent No. 6,334,479, wherein the *"Detailed Description of the Preferred Embodiment"* is similar to that in U.S. Patent No. 6,334,479. Accordingly, the present application differs from Canadian Patent Application No. 2,308,990 by paragraphs [0074] to [0082], as described hereinabove.

- 7 -

Commissioner for Patents

Die-casting machines, such as those described in U.S. Patents No. 6,334,479 and 4,601,323, and Canadian Patent Application No. 2,308,990, involve the use of connectors, such as bolts and the like, by which a mold section, in which a piece is cast, is secured to a shank. The shank is the portion of the die-casting machine that is displaceable in order to bring the mold sections against one another such that a part may be cast therein. Accordingly, when the Applicants refer to a leading end of the shank, the Applicants refer to the end of the shank to which the mold section is connected, namely the end of the shank that will "lead" the mold sections toward one another when the mold sections are clamped together.

As a single die-casting machine is used for producing various cast parts, the mold sections must often be changed such that the die-casting machine produces different parts. The mold section-changing procedure is time-consuming, as various connectors are used in order to ensure that the mold section remains secured to the shank, as the combination thereof will be displaced by the clamping system and must precisely come into contact with an opposite mold section/shank assembly (i.e., the slide section), in the case of a dual-slide system.

Therefore, the Applicants have developed a mold section assembly to facilitate the replacement of the mold section from a multiple-slide die-casting machine. The mold section assembly of the present invention, as stated in claims 33 and 39, involves the presence of a mold section, a mounting plate and securing means. The mold section is the portion that defines a cavity in which a cast part will be produced. The mounting plate is releasably secured to the mold section and interconnects the mold section to the leading end of the shank, by way of the securing means.

Prior to arguing the grounds for rejection by the Examiner, the Applicants herein amend claims 33 and 39 to emphasize that the mounting plate is "releasably secured" to the mold section. Moreover, it is now emphasized that the mounting plate has "sliding connection means" to be engaged to the shank. These further limitations enable independent claims 33 and 39 to patentably distinguish over the prior art.

In Item 2 of the present Office Action, the Examiner rejects claims 33 and 39, amongst others, under 35 U.S.C. 102(b), as being anticipated by the present

- 8 -

Commissioner for Patents

Applicants' U.S. Patent No. 4,601,323. Accordingly, with regard to U.S. Patent No. 4,601,323, the Applicants refer the Examiner to Fig. 7 thereof, in which the shank 10 is shown directly connected to the mold 58, with no mounting plate therebetween. The Examiner argues that the base plate 14 (Fig. 3) of U.S. Patent No. 4,601,323 is the equivalent to the mounting plate of claims 33 and 39. The Applicants argue that the base plate 14 of U.S. Patent No. 4,601,323 defines the guideway in which the hold section 58 is displaced, as it is clearly stated in lines 16 to 17 of column 3 of U.S. Patent No. 4,601,323 that *"the guideway 4 is of box-like configuration and includes a base plate 14"*. Therefore, as claims 33 and 39 have a limitation that *"a mounting plate [is] releasably secured to the mold section"*, and *"a mold section [is] releasably secured to the mounting plate"*, respectively, the base plate 14 of U.S. Patent No. 4,601,323 is clearly not intended to be a mounting plate, as it rather forms a guideway. The Applicants believe that claims 33 and 39, as now amended, have structure by which they patentably distinguish over U.S. Patent No. 4,601,323. More specifically, with the absence of a mounting plate in U.S. Patent No. 4,601,323, the Applicants argue that claims 33 and 39 are clearly novel in view of this reference.

In Item 3 of the present Office Action, the Examiner has rejected claims 33 and 39, amongst others, as being anticipated by U.S. Patent No. 6,334,479 or Canadian Patent Application No. 2,308,990. With regard to both U.S. Patent No. 6,334,479 and Canadian Patent Application No. 2,308,990, the Applicants draw the Examiner's attention to Fig. 3 thereof, in which a mold section 54A is shown directly mounted to the shank 58. As the mold section 54A is mounted directly to the shank 58, the Applicants emphasize that there is no "mounting plate" between the mold section 54A and the shank, as is required by claims 33 and 39 of the present application. Moreover, in Item 3 of the present Office Action, the Examiner indicates that the equivalent to the mounting plate of claims 33 and 39 is the base plate 22. Again, the Examiner identifies a structural element as equivalent to the *"mounting plate"*. As described above, the *"mounting plate"* connects the mold section to the shank, whereby it moves therewith. Therefore, the base plate 22 cannot be considered to be "releasably secured" to the mold section, as the base plate 22 is structural and defines the guideway in which the mold section/mounting plate of the

- 9 -

Commissioner for Patents

present invention will be displaced. Accordingly, the Applicants argue that U.S. Patent No. 6,334,479 and Canadian Patent Application No. 2,308,990 do not describe a "mounting plate releasably secured to the mold section" (claim 33), or "a mold section releasably secured to the mounting plate" (claim 39), as clearly illustrated in Fig. 3 of both references. Therefore, the Applicants strongly believe that claims 33 and 39 are novel in view of the teachings of U.S. Patent No. 6,334,479 and Canadian Patent Application No. 2,308,990, as the structure "mounting plate" is absent from both these references. In the event that the Examiner is not convinced, the Applicants request a telephone interview to discuss the above subject matter.

In view of the above amendments and remarks, this application is now believed to be in order for allowance, and early notice to that effect is earnestly solicited.

Respectfully submitted,

ALEXANDRE A. POLLAK ET AL.

By:

March 9, 2004

(Date)



Pierre T. NGUYEN (Reg. No. 55,043)

Agent of Record

OGILVY RENAULT

1981 McGill College Avenue, Suite 1600

Montreal, Quebec, Canada H3A 2Y3

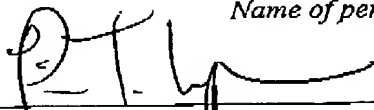
Tel.: (514)847-4243

**CERTIFICATION OF FACSIMILE TRANSMISSION**

I hereby certify that this paper is being facsimile-transmitted to the Patent and Trademark Office on the date shown below.

Pierre T. NGUYEN, Reg. No. 55,043

Name of person signing certification



Signature

March 9, 2004

Date